Libby Biomass Working Group

Energy, Jobs and Environmental Protection thru forest waste utilization



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Max Dodson Assistant Regional Administrator 999 18th St. Suite 500 Denver, Colorado 80202-2466

July 30, 2003

Dear Mr. Dodson,

Enclosed please find a letter of support for our <u>Forest Biomass Comprehensive Plan</u> from Jim Christianson, Remedial Project Manager for the Libby Superfund site. Our project combines the use of innovative new harvesting equipment to utilize slash and forest thinnings in clean-burning cogenerators in conjunction with value-added processing for 2" and larger stems in a composite mill.

This approach has a number of environmental benefits, particularly in Montana Airshed One, which includes the city of Libby. Because of its geographical location Libby has historically suffered from frequent air inversions and poor air quality.

Using state-of-the art combustion technology, modern cogenerators provide dramatic reductions in CO, NOx, and particulate emissions compared to the boiler systems which were used at the Libby mill site. In addition to mitigating fire danger, harvesting hazardous fuels will limit the necessity for prescribed burning, which has already entrained 800 tons of PM 2.5, PM 10, and larger particulate matter in to the Libby airshed this year, according to our analysis of U.S. Forest Service data.

Removal of hazardous fuels in the Libby area will also lessen the possibility of wildfire reentraining asbestos fibers, which it is believed may have accumulated on the forest floor from atmospheric deposition during the years of W.R. Grace's Zonolite milling operations.

Our <u>Comprehensive Plan</u> also calls for the installation of a demonstration hydronic heat loop system for public buildings and residential areas in Libby, modeled on widely proven European engineering. To the extent that this clean hot water system replaces fossil fuel burning, especially of fuel oils, atmospheric levels of VOC's and particulates can be expected to decline, improving air quality for the sensitive population.

We appreciate the cooperation and support that we have received from Mr. Christianson and the local EPA staff. Our project also has solid endorsements from the Montana Secretary of State, local elected officials, State and U.S. Forest Service, and Plum Creek Timber Company.

We are particularly interested in following up Mr. Christianson's suggestion that the research and development component of the E.P.A. might collaborate in our efforts to improve Libby's air quality while revitalizing the local economy. It would be very beneficial to Libby's environmental health if we could integrate EPA's R&D expertise with the wealth of technical data provide us by the Montana Department of Environmental Quality.

It is also our hope to develop a working relationship with the U.S. Department of Energy, possibly to the extent of establishing a national demonstration project for cogeneration in Libby, which could serve as a model for thousands of other communities nationwide.

Please contact us if you have any questions regarding our project or the technologies involved. Actual implementation of the <u>Comprehensive Plan</u> will be overseen by <u>U.S. Bioenergy Corp.</u>, a for-profit company.

Sincerely,

Ron Carter

Environmental Coordinator Libby Biomass Working Group

CC:

Bob Brown, Montana Secretary of State

Howard Haines, Montana Dept. of Environmental Quality

Enc:

Letters of Support

Bob Brown

Jim Christianson EPA John Scahill, NREL